



LOWEY DANNENBERG, P.C.

February 10, 2023

VIA ECF

The Honorable Sidney H. Stein
Daniel Patrick Moynihan
United States Courthouse
Southern District of New York
500 Pearl Street
New York, New York 10007-1312

Re: *Sonterra Capital Master Fund Ltd., et al. v. Credit Suisse Group AG, et al.*, No. 15-cv-00871-SHS (S.D.N.Y.)

Dear Judge Stein:

We represent Plaintiffs in the above-captioned matter.

As noted in our letter to the Court dated January 6, 2023 (ECF No. 410), Plaintiffs and NEX Group plc, NEX International Limited (f/k/a ICAP plc), ICAP Capital Markets LLC (n/k/a Intercapital Capital Markets LLC), ICAP Securities USA LLC, and ICAP Europe Limited (collectively, "ICAP") have executed a binding settlement term sheet, and the parties are working to finalize a stipulation and agreement of settlement. Plaintiffs had anticipated that they would file their motion for preliminary approval of ICAP's settlement by February 10, 2023. While the parties have made progress in negotiating the stipulation and agreement of settlement, they require some additional time to complete negotiations, execute the settlement agreement, and file the preliminary approval motion.

Plaintiffs and ICAP jointly request that the Court extend the temporary stay of all litigation proceedings and deadlines between Plaintiffs and ICAP until March 13, 2023 when Plaintiffs anticipate they will file a motion seeking preliminary approval of their settlement with ICAP. The motion papers will include revised proposed notice documents that include information about the proposed ICAP settlement, the proposed settlements with NatWest Markets Plc (f/k/a The Royal Bank of Scotland plc); Deutsche Bank AG and DB Group Services (UK) Ltd.; and Credit Suisse Group AG and Credit Suisse AG currently pending before the Court, and the settlement with JPMorgan Chase & Co. that the Court preliminarily approved. *See* ECF Nos. 149-51, 159, 382-87, 389-95.

We are available to address any questions Your Honor may have.

Respectfully,

/s/ Vincent Briganti
Vincent Briganti

cc: All Counsel of Record (via ECF)

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